

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

HANS A. QUAACK, ATTILIO PO
and KARL LEIBINGER, on behalf of
themselves and those similarly situated,

Plaintiffs,

v.
DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING
CORP., SA),

Defendants.

Civil Action No.: 03-11566 (PBS)

STONINGTON PARTNERS, INC., a Delaware
Corporation, STONINGTON CAPITAL
APPRECIATION 1994 FUND L.P., a Delaware
Partnership and STONINGTON HOLDINGS,
L.L.C., a Delaware limited liability company,

Plaintiffs,

v.
DEXIA, S.A. and DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING
CORP., SA),

Defendants.

Civil Action No.: 04-10411 (PBS)

GARY B. FILLER and LAWRENCE
PERLMAN, Trustees of the TRA Rights Trust,

Plaintiffs,

v.
DEXIA, S.A. and DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING
CORP., SA),

Defendants.

Civil Action No.: 04-10477 (PBS)

JANET BAKER and JAMES BAKER,
JKBAKER LLC and JMBAKER LLC,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING
CORP., SA),

Defendants.

Civil Action No.: 04-10501 (PBS)

**DEXIA BANK BELGIUM'S UNOPPOSED MOTION
FOR LEAVE TO FILE SUPPLEMENTAL STATEMENT
CONCERNING PROPOSED RULE 30(b)(6) DEPOSITIONS**

Dexia Bank Belgium ("Dexia") respectfully seeks leave to file a supplemental statement with respect to Plaintiffs' Motion for Leave to Submit a Reply Concerning the Need for 30(b)(6) Depositions ("Plaintiffs' motion") filed on December 1, 2006 (Quaak # 420, Stonington # 216, Filler # 234, Baker # 211). Plaintiffs do not oppose this motion seeking leave to file a supplemental statement on the condition that Dexia will not will not oppose a motion by Plaintiffs to file their own supplemental statement, which they expect to file by January 5, 2007. Dexia respectfully submits that a supplemental statement will assist this court in deciding on Plaintiffs' motion because since the time when that motion was filed, Plaintiffs have deposed Stefaan Decraene and Axel Miller. Mr. Decraene is the President of Dexia Bank Belgium. Mr. Miller is the former President of Dexia Bank Belgium, and is currently the CEO of the bank's holding company, Dexia S.A. Mr. Decraene's deposition took place in Belgium on December 1, 2006, and Mr. Miller's deposition took place on December 6, 2006. Dexia seeks leave to file a

short supplemental statement because it believes that Mr. Decraene's and Mr. Miller's deposition testimony are both highly relevant to the disposition of Plaintiffs' motion.

WHEREFORE, Dexia respectfully requests that this Court grant it leave to file the supplemental statement, filed herewith through the ECF system.

Dated: December 21, 2006

Respectfully submitted,

MINTZ LEVIN COHN FERRIS
GLOVSKY & POPEO

By: /s/ Breton Leone-Quick
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Counsel for Dexia Bank Belgium

Local Rule 7.1(A)(2) Certification

The above-signed counsel hereby certifies that, pursuant to Local Rule 7.1(A)(2), counsel for Dexia conferred with counsel for Plaintiffs who do not oppose this motion on the condition that Dexia not oppose Plaintiffs' motion (to be filed by January 7, 2006) to submit a supplemental report of their own.

Certificate of Service

I, Breton Leone-Quick, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on December 21, 2006.

/s/ Breton Leone-Quick

Dated: December 21, 2006